

Mr. Michael Elliot
Jasper Seating, Inc.
P.O. Box 231
Jasper, IN 47547-0231

Re: 037-10735
First Administrative Amendment to
Part 70 037-5805-00010

Dear Mr. Elliot.:

Jasper Seating, Inc. was issued a permit on December 21, 1998 for a stationary wood office furniture (chair) manufacturing plant. An application requesting a Significant Source Modification was received on March 12, 1999. Pursuant to the provisions of 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-11 the Part 70 permit is hereby administratively amended to incorporate the requirements of the Significant Source Modification No. 037-10701-00010.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, at (800) 451-6027, press 0 and ask for Nysa L. James or extension (3-6875), or dial (317) 233-6875.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments: Revised and new Part 70 permit pages (10 pages)

NLJ

cc: File - **Dubois** County
U.S. EPA, Region V
Dubois County Health Department
Southwest **Regional Office**
Air Compliance Section Inspector: Ray Schick
Compliance Data Section - Mindy Jones
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Jasper Seating, Inc.
932 Mill Street, P.O. Box 231
Jasper, Indiana 47547-0231**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T037-5805-00010	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 21, 1998
First Significant Source Modification: T-037-10701	Pages Affected: 3,5-6,29-34 and 43
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.11 Compliance Schedule [326 IAC 2-7-6(3)]
- C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.14 Monitoring Methods [326 IAC 3]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-6] [326 IAC 2-7-19]
- C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]
- C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Surface Coating

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 PSD Limit [326 IAC 2-2][40 CFR 52.21]
- D.1.2 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]
- D.1.3 Work Practice Standards [40 CFR 63.803]
- D.1.4 Best Available Control Technology (BACT)
- D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
- D.1.6 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.8 Testing Requirements [326 IAC 2-7-6(1), (6)]
- D.1.9 Volatile Organic Compounds (VOC)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.10 Monitoring
- D.1.11 Particulate Matter (PM)

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.12 Record Keeping Requirements
- D.1.13 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - Woodworking operations

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Particulate Matter (PM)
- D.2.2 Opacity
- D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.4 Testing Requirements [326 IAC 2-7-6(1), (6)]
- D.2.5 Particulate Matter (PM)

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary wood office furniture (chair) manufacturing plant.

Responsible Official: Jasper Seating, Inc.
Source Address: 932 Mill Street, P.O. Box 231, Jasper, Indiana 47547-0231
Mailing Address: 932 Mill Street, P.O. Box 231, Jasper, Indiana 47547-0231
SIC Code: 2521
County Location: Dubois County
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) Eleven (11) surface coating operations, consisting of the following:
 - (a) one (1) dip tank identified as EU-03 with a maximum unit capacity of 40 chairs per hour, exhausting to stack vent S/V-03 and
 - (b) seven (7) spray booths, with dry filters for particulate control identified as:
 - (i) EU-06 with a maximum unit capacity of 40 chairs per hour and EU-06 exhausts to two (2) stack vents, identified as S/V-06 and S/V-07 and
 - (ii) EU-08 through EU-12 with a maximum unit capacity of 120 chairs per hour, EU-08 exhausts to S/V-08, EU-09 exhausts to two (2) stack vents, identified as EU-9a and EU-9b, EU-10 through EU-12 exhaust to S/V-10 through S/V-12.
 - (iii) EU-05 with a maximum unit capacity of 125 chairs per hour and exhausts to S/V-12.
 - (c) Three (3) wood furniture air-assisted airless and HVLP spray booths, designated as EU-04, EU-14 and EU-15, with a maximum unit capacity of 125 chairs per hour, particulate matter controlled by dry filters, EU-04 exhausts to a stack designated as V4, EU-014 exhausts to two (2) stacks designated as V16 and V17, and EU-15 exhausts to a stack designated as V18.
- (2) One (1) 10.46mmBtu per hour natural gas fired boiler, identified as EU-01, exhausting to stack vent S1.
- (3) One (1) 9.28mmBtu per hour wood fired boiler, identified as EU-02, exhausting to stack vent S2.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Woodworking identified as EU-13, controlled by three (3) baghouses and two (2) cyclones in series, exhausting to stack vent V13 through V15.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Eleven (11) surface coating operations, consisting of the following:

- (a) one (1) dip tank identified as EU-03 with a maximum unit capacity of 40 chairs per hour, exhausting to stack vent S/V-03 and
- (b) seven (7) spray booths, with dry filters for particulate control identified as:
 - (i) EU-06 with a maximum unit capacity of 40 chairs per hour and EU-06 exhausts to two (2) stack vents, identified as S/V-06 and S/V-07 and
 - (ii) EU-08 through EU-12 with a maximum unit capacity of 120 chairs per hour, EU-08 exhausts to S/V-08, EU-09 exhausts to two (2) stack vents, identified as EU-9a and EU-9b, EU-10 through EU-12 exhaust to S/V-10 through S/V-12.
 - (iii) EU-05 with a maximum unit capacity of 125 chairs per hour and exhausts to S/V-12.
- (c) Three (3) wood furniture air-assisted airless and HVLP spray booths, designated as EU-04, EU-14 and EU-15, with a maximum unit capacity of 125 chairs per hour, particulate matter controlled by dry filters, EU-04 exhausts to a stack designated as V4, EU-014 exhausts to two (2) stacks designated as V16 and V17, and EU-15 exhausts to a stack designated as V18.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The surface coating operations identified as EU-03, through EU-06, EU-08 through EU-12, EU-14 and EU-15 shall be limited to 242.6 tons of VOC per twelve (12) consecutive months, rolled on a monthly basis, including coatings dilution solvents and cleaning solvents. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.
- (b) During the first 12 months of operation, the potential to emit of VOC shall be limited such that the total emissions divided by the accumulated months of operation shall be less than 20.22 tons per month.

D.1.2 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.

- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
 - (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
 - (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.1.3 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.

- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

D.1.4 Best Available Control Technology [326 IAC 8-1-6]

Pursuant to PC (19) 1688, issued June 10, 1988, surface coating booth EU-06 shall:

- (a) use air assisted airless spray guns for surface coating and
- (b) the volatile organic solvent content in the coatings shall be limited to 7.0 pounds per gallon of coating, excluding water, delivered to the applicator for all coatings. These emissions shall be averaged on a daily basis.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating operations designated as EU-03 through EU-05, EU-08 through EU-12, EU-14 and EU-15 shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.6 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitation), the surface coating operations shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic foot (g/dscm)((0.03 grain per dry standard cubic foot (dscf)).

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-7-6(1), (6)]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

- (b) The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.1.1, D.1.2, and D.1.5 shall be determined by performance tests conducted in accordance with Section C - Performance Testing.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2, and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan and the Work Practice Implementation Plan.

D.1.11 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the ten (10) surface coating booths (EU-04, EU-05, EU-06, and EU-08 through EU-12, EU-14 and EU-15) are in operation.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.2.
- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.3, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Condition D.1.4, the Permittee shall maintain a log of the quantities, densities, and organic solvent contents of all coatings, and solvent thinners and cleaners used. These records shall be kept for at least the past twenty-four month period and made available upon request of the Office of Air Management.
- (e) To document compliance with Condition D.1.6, D.1.10, and D.1.11 the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

- (a) An Initial Compliance Report to document compliance with Condition D.1.2, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within sixty (60) calendar days following the compliance date of November 21, 1997. The initial compliance report must include data from the entire month that the compliance date falls.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.2, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

For the first year following the compliance date, the Continuous Compliance Reports shall cover the following months:

- (1) November 21, 1997 through May 20, 1998.
 - (2) May 21 through November 30, 1998..
 - (3) December 1 through December 31, 1998.
- (c) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.
 - (d) The reports required in (a) and (b) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (e) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Jasper Seating, Inc.
Source Address: 932 Mill Street, Jasper, Indiana 47547-0231
Mailing Address: P.O. Box 231, Jasper, Indiana 47547-0231
Part 70 Permit No.: T037-5805-00010
Facility: Surface Coating Booths
Parameter: EU-03 through EU-06, EU-08 through EU-12, EU-14 and EU-15
Limit: 242.6 tons of VOC per twelve (12) consecutive month period, rolled on a monthly basis.

YEAR: _____

Month	Usage (tons/month)	Usage for previous month (tons)	Usage for previous twelve month period (tons)	Emissions (tons/month)	Emissions for previous month (tons)	VOC Emissions for previous twelve month period (tons)

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____